

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

In the Matter of

Advanced Television Systems
and Their Impact upon the
Existing Television Broadcast
Service

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) MM Docket No. 87-268 --
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COMMENTS OF RAOUL LOWERY CONTERERAS

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

There are a number of operating low power television stations around the country that will be drastically affected, if not put out of business, by proposed elements of a digital television order scheduled for adoption in March 1997. I would argue against any such order that would endanger LPTV stations for several reasons. Number one, today there are few avenues, if any, available to small business and minority/ethnic people to enter the mass communications industry.

The capital requirements to enter the mass communications industry, with the exception of LPTV, are usually out of reach for minority/ethnic business or journalist type people. The number of minority owned television stations today is less than 2%; in the LPTV industry it is my understanding it is much higher.

Thus, any proposed order that might decimate the LPTV industry will strike at the heart of minority/ethnic participation in mass communications.

Minority/ethnic participation, in my view is extremely important in all media, but in particular in the electronic media which is viewed or listened to by the vast majority of Americans.

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Being a syndicated newspaper columnist I can reach a maximum of 10,000,000 people in US Today when they print one of my opinion pieces on their commentary page. If, on the other hand, I make a network television appearance and say the same thing as my newspaper article, I can be seen by as many as 30,000,000 people.

The importance, therefore, of minority/ethnic participation in the mass media and the exposure of minority/ethnic views in the mass media should be of paramount importance to the Commission which represents all of the people in the country.

But, it is not only views of minority/ethnic people which the Commission should work to expose but actual coverage of minority/ethnic affairs for minority/ethnic audiences. For example, few in the minority community watch PGA Golf events, but I can assure the Commission that a soccer game between the USA national team and the Mexican national team in the San Diego stadium would be watched by hundreds of thousands of people in Southern California, where two of three Latino households are headed by recent Latino immigrants.

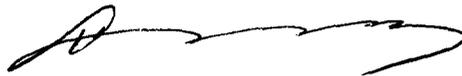
Another example would be the decades long competition between two Mexican American high schools in Los Angeles on the football field. The game between Garfield and Roosevelt high schools draws in excess of 30,000 spectators into an overflowing stadium and would be watched by many thousands of the 7,000,000 people of Mexican origin in Los Angeles if it were televised.

For a very minimal cost, LPTV can broadcast such an event and do so to a very appreciative audience. Full power TV stations indicate little interest in such events. There are many

other examples of their lack of interest and many other examples of LPTV interest in events that full power stations ignore.

For these reasons and many others I personally petition the Commission to revise the rules and policies proposed in the Sixth Further Notice to protect existing on air LPTV's from any harm caused by a final DTV order and to loudly proclaim the contribution LPTV can make to the mass communications industry and audience that the Commission is required to serve.

Respectfully submitted,



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